

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO PUBLIC REPRESENTATIVE INTERROGATORIES
(PR/USPS-T4—11-14)
(March 8, 2012)**

The United States Postal Service files the responses of witness Neri (USPS-T-4) to the above-listed interrogatories of the Public Representative dated February 23, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
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PR/USPS-T4-11

Please refer to page 24 of your testimony where you state: "Currently, approximately 252 mail processing facilities are being studied for potential consolidation and/or closure". Please explain how these 252 facilities were selected and provide the details of the analysis made prior the selection, if applicable.

RESPONSE:

Please see section III of the *Direct Testimony of Emily R. Rosenberg on Behalf of the United States Postal Service (USPS-T-3)*.

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PR/USPS-T4-12

Please refer to page 27 of your testimony where you state: "As processing windows are expanded and the workload is balanced across the mail processing day, the Postal Service would be able to manage processing operations effectively, match workhours to workload, and plan for peak load issues."

- a. Please provide the details of the Postal Service's plan to deal with peak load issues, or alternatively, indicate that such a plan does not exist.
- b. Please indicate the specific months, days, or tours the Postal Service identifies as being at risk of encountering peak load problems?
- c. Please identify those facilities by facility number and, if applicable, months, days, or tours the Postal Service identifies as potentially encountering peak load problems.

RESPONSE:

- a. The reference to peak load issues in the context of my testimony addresses today's environment in which mail must be sorted in a very short operational window that is not dependent on volume. In the proposed environment, all destinating First-Class Mail will be available for processing at a facility by noon. Accordingly, fluctuations in volume will be managed by an extension of the processing window, which is not possible in today's environment under current service standards.
- b. This subpart refers to peak load issues in the context of seasonal fluctuations in volume. Please see the response to APWU/USPS-T1-4 for clarification of the modeling pertinent to this subpart.
- c. Please see the response to APWU/USPS-T1-4.

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PR/USPS-T4-13

Please refer to your response to PR/USPS-4-4 (b) where you state: “g. SumOfDown Time – This is the number of hours that the machines (by type in column B) were down...”. Please also refer to LR-USPS-N2012-1/44, Materials Responsive to PR USPS-T4-1(b), LR44(Neri).xls, worksheet ‘Data’.

- a. Please explain what a negative value for SumOfDown Time means? For example, ‘SumOfDown Time on October 31, 2010 for AFCS was ‘-0.4886’ (see, column G, line 29 of worksheet ‘Data’).
- b. Please refer to worksheet ‘Data’ and note that there is no data for APBS for the months of October 2010, February 2011 and March 2011. Please explain if/why APBS was not running during those months, or, if the data was unintentionally omitted, please provide it.

RESPONSE:

- a. This subpart refers to an error in the data appearing in USPS Library

Reference USPS-LR-N2012-1/44. The inaccuracy arose from a reporting error attributable to a machine in San Antonio.

- b. The APBS began deployment in Fiscal Year 2011. The data discrepancies identified in this subpart arose from the performance of equipment testing at that time.

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PR/USPS-T4-14

Please refer to your response to GCA/USPS-T4-2 where you state: “the 487 figure referenced in the testimony was the count of network facilities as of September 15, 2011. The list of facilities...appear in Library Reference USPS-LR-N2012-1/57.” Please also refer to LR-USPS-N2012-1/10, Materials in Support of T-4, file FY2010_EOR_RunDownIdle Time Lib Ref and your response to POIR 1, question 22 a. where you state: “The file, FY2010_EOR_RunDownIdle Time.xls was created by extracting raw Fiscal Year 2010 end of Run (EOR) Data for all EOR facilities (see list in column B), for all equipment at these sites, for all runs”.

- a. Please provide definition for End of Run (EOR) facilities listed in USPS-LR-N2012-1/10.
- b. Please explain how EOR facilities listed in USPS-N2012-1/10 correspond to network facilities listed in USPS-LR-N2012-1/57.
- c. Please confirm that 892 EOR sites listed in USPS-N2012-1/10 include all 487 network facilities listed in USPS-LR-N2012-1/57.
 - i. If confirmed, please provide the description of other EOR sites included in USPS-N2012-1/10, but not included in USPS-LR-N2012-1/57.
 - ii. If not confirmed, please explain what facilities listed in USPS-N2012-1/57 are not listed in USPS-LR-N2012-1/10, and the rationale.

RESPONSE:

- a. The list of End-of-Run (EOR) Facilities in USPS Library Reference USPS-LR-N2012-1/10 reflects facilities that contained mail processing equipment and reported to End-of-Run in Fiscal Year 2010.
- b. The EOR facilities listed in USPS-LR-N2012-1/10 do not correspond to the network facilities listed in USPS-LR-N2012-1/57. Network facilities have been defined by the United States Postal Service for purposes of reporting in the Annual Compliance Report. The Postal Service does not consider some smaller decentralized operations to be network facilities.
- c. Not confirmed.
 - i. Not applicable.

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RESPONSE to PR/USPS-T4-14 (continued):

ii. End-of-Run contains only equipment data, and some facilities listed in USPS

Library Reference USPS-LR-N2012-1/57 do not contain mail processing
equipment.